

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

.....X

UNITED STATES OF AMERICA :

- against - :

PETER J. AJEMIAN, :  
PETER J. LESNIEWSKI, :  
MARIA RUSIN, :  
MARIE BARAN, :  
JOSEPH RUTIGLIANO, :  
GREGORY NOONE, :  
REGINA WALSH, :  
SHARON FALLOON, :  
GARY SATIN :  
STEVEN GAGLIANO, :  
RICHARD EHRLINGER, :  
BRIAN DELGIORNO :  
PHILIP PULSONETTI :  
GREGORY BIANCHINI :  
FRANKLIN PLAIA :  
MICHAEL STAVOLA :  
MICHAEL DASARO :  
KARL BRITTEL :  
KEVIN NUGENT :  
GARY SUPPER, and :  
THOMAS DELALLA, :

Defendants. :

.....X

**NOTICE OF DEFENDANT  
WALSH'S MOTION FOR  
RELIEF PURSUANT TO  
RULE 12(b)(4)(B),  
FED. R. CRIM. P.**

S1 11 Cr. 1091 (VM)

PLEASE TAKE NOTICE that upon the annexed affirmation of Paul B. Bergman, dated June 5, 2012, counsel for defendant Regina Walsh, and upon the accompanying Memorandum of Law in Support of Defendant Walsh's Motion for Relief Pursuant to Rule 12(b)(4)(B) Fed. R. Crim. P., the defendant will move this Court, before the Hon. Victor Marrero, United States District Judge for the Southern District of New York, at the United

States Courthouse, 500 Pearl Street, Courtroom 20B, New York, New York, at a time and date to be set by the Court, for the following relief:

1. For an Order, pursuant to Rule 12(b)(4)(B) Fed. R. Crim. P., directing the Government to identify all statements made by defendants in this action upon which the Government intends to rely in its evidence-in-chief at trial; and
2. For such other and further relief as the Court may deem just and appropriate.

Dated: New York, New York  
June 5, 2012

Yours, etc.

PAUL B. BERGMAN, P.C.

By: /S/  
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TO: Hon. Victor Marrero  
United States District Judge  
Southern District of New York  
(Courtesy Copies By Hand)

All Counsel of Record (By ECF)